

1 **MARTORELL LAW APC**
2 Eduardo Martorell, State Bar No. 240027
3 EMartorell@Martorell-Law.com
4 6100 Center Drive, Suite 1130
5 Los Angeles, CA 90045
6 Telephone: (323) 840-1200
7 Facsimile: (323) 840-1300

8
9
10 Attorneys for Plaintiff,
11 MICHAEL MOEBIUS

12
13
14 **UNITED STATES DISTRICT COURT**
15 **CENTRAL DISTRICT OF CALIFORNIA**

16 MICHAEL MOEBIUS, individually,

17 Plaintiff,

18 v.

19 SHEIN DISTRIBUTION
20 CORPORATION, a Delaware
21 Corporation; ROADGET BUSINESS
22 PTE, LTD., a Singapore wholesale trade
23 company dba "SHEIN"; and DOES 1
24 through 100,

25 Defendants.

26 Case No.: 2:22-cv-08259-SVW-Ex

27 *Hon. Stephen V. Wilson*

28 **STIPULATION TO DISMISS
ACTION PURSUANT TO FRCP
41(a)(1)(A)(ii)**

Action Filed: November 11, 2022
FAC Filed: Sept. 11, 2023
Pretrial Conf.: Vacated
Trial Date: Vacated

1 Plaintiff Michael Moebius (“Plaintiff”) and Defendants Shein Distribution
2 Corporation (“SDC”), and Roadget Business PTE, Ltd. dba SHEIN (collectively,
3 “Defendants” and with Plaintiff, the “Parties”), by and through the undersigned
4 counsel of record, jointly submit this Stipulation to Dismiss Action, with prejudice,
5 pursuant Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure.

6 WHEREAS, pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil
7 Procedure, all Parties having appeared in the above-captioned action as of the date of
8 signing consent to the dismissal of the above-captioned action, where each party will
9 bear their own fees and costs.

10 WHEREAS, pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil
11 Procedure, the Court need not issue an order for this Stipulation of Voluntary
12 Dismissal to take effect.

13 WHEREFORE, IT IS HEREBY STIPULATED by, between, and among the
14 Parties, that Plaintiff dismisses this action in its entirety.

15
16 Dated: November 8, 2024

MARTORELL LAW APC

17 By: /s/ Eduardo Martorell
18 Eduardo Martorell
19 *Attorneys for Plaintiff,*
20 *MICHAEL MOEBIUS*

21 Dated: November 8, 2024

**MERCHANT & GOULD, LLP
PIETZ & SHAHRIARI, LLP**

22 By: /s/ Scott Shaw
23 Scott Shaw
24 Morgan E. Pietz
25 *Attorneys for Defendants,*
26 *SHEIN DISTRIBUTION CORP. and*
27 *ROADGET BUSINESS PTE, LTD.*

1 **ECF CERTIFICATION**

2 Pursuant Local Civil Rule 5-4.3.3(a)(2)(i), I hereby attest that Scott Shaw, on
3 whose behalf this filing is jointly submitted, has concurred in this filing's content
4 and has authorized me to file this document.

5 */s/ Eduardo Martorell*
6 Eduardo Martorell

MARTORELL LAW APC

Litigation & Trial Counsel

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28